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Attorneys for Defendants Watchtower Bible and Tract Society of New York, Inc., and Watch Tower Bible and Tract Society of Pennsylvania

IN THE UNITED STATES DISTRICT COURT FOR THE DISTRICT OF MONTANA **BILLINGS DIVISION**

TRACY CAEKAERT, and CAMILLIA Cause No. CV 20-52-BLG-SPW MAPLEY,

Plaintiffs.

VS.

WATCHTOWER BIBLE AND TRACT SOCIETY OF NEW YORK, INC., WATCH TOWER BIBLE AND TRACT SOCIETY OF PENNSYLVANIA, and BRUCE MAPLEY SR.,

Defendants.

DEFENDANTS WATCH TOWER BIBLE AND TRACT SOCIETY OF PENNSYLVANIA'S AND WATCHTOWER BIBLE AND TRACT SOCIETY OF NEW YORK. **INC.'S UNOPPOSED MOTION** FOR EXTENSION OF TIME TO **FILE RESPONSE BRIEFS**

WATCHTOWER BIBLE AND TRACT SOCIETY OF NEW YORK, INC.				
Cross-Claimant,				
vs.				
BRUCE MAPLEY SR.,				
Cross-Claim Defendant.				

COMES NOW Defendants Watch Tower Bible and Tract Society of Pennsylvania (hereinafter "WTPA") and Watchtower Bible and Tract Society of New York, Inc. (hereinafter "WTNY"), by and through their attorneys, and hereby move the Court for an extension of time to file response briefs.

Specifically, WTPA and WTNY are seeking a one-week extension to file a response brief to Plaintiffs' Motion to Compel Jurisdictional Discovery Responses and For Costs and Fees (Doc. 56). Currently, a response is due on or before May 4, 2021. If granted, the requested one-week extension would make a response due on or before May 11, 2021.

Additionally, WTPA and WTNY are seeking a one-week extension to file a response brief to Plaintiffs' Motion to Compel Re: The Hardin Congregation Subpoena (Doc. 58). Currently, any response is due May 5, 2021. While neither WTPA nor WTNY have decided whether they will respond, to the extent either

decides to respond, both respectfully request a one-week extension such that any

response will be due on or before May 12, 2021.

Good cause exists for the requested extensions of time to file response briefs

described above considering a deposition took place last Friday, April 23, 2021,

WTPA has been in the process of supplementing jurisdictional discovery¹, and

counsel for WTPA and WTNY have scheduling conflicts in the coming week which

render the existing due dates of May 4 and May 5, respectively, unworkable.

Both Plaintiffs' counsel and Defendant/Cross-Claim Defendant Bruce

Mapley Sr. have been contacted regarding this Motion, and this Motion is

unopposed.

Pursuant to L.R. 7.1(c)(3), a proposed Order is attached to this Motion in PDF

format and also e-mailed to the Judge in Word format.

DATED this 29th day of April, 2021.

By: /s/ Jon A. Wilson

Jon A. Wilson

BROWN LAW FIRM, P.C.

Attorneys for Defendants Watchtower Bible and Tract Society of New York, Inc., and Watch Tower Bible and

Tract Society of Pennsylvania

¹ WTPA served supplemental jurisdictional discovery on both April 19, 2021 and April 28, 2021.

Defendants WTPA's and WTNY's Unopposed Motion for Extension of Time to File Response Briefs - 3

CERTIFICATE OF SERVICE

I hereby certify that, on Aril 29, 2021, a copy of the foregoing was served on the following person(s):

- 1. U.S. District Court, Billings Division
- Robert L. Stepans
 Ryan R. Shaffer
 James C. Murnion
 MEYER, SHAFFER & STEPANS, PLLP
 430 Ryman Street
 Missoula, MT 59802
- 3. Bruce G. Mapley Sr. 3905 Caylan Cove Birmingham, AL 35215

by the following means:

1, 2	CM/ECF		FaX
	Hand Delivery		E-Mail
3	U.S. Mail		Overnight Delivery Services
		D.,,	/s/ Ion A. Wilson
		Бу: _	/s/ Jon A. Wilson
			Jon A. Wilson
			BROWN LAW FIRM, P.C.
			Attorneys for Defendants Watchtower
			Bible and Tract Society of New York,
			Inc., and Watch Tower Bible and
			Tract Society of Pennsylvania